

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GLENN GOODWIN)	
)	Case No.
and)	
)	
RONALD KING)	Judge
Plaintiffs,)	
v.)	
)	<u>Notice of Removal</u>
AMERICAN MARINE EXPRESS, INC.,)	
)	
GURAI LEASING COMPANY, LLC,)	
)	
INTERMODAL FACILITIES GROUP,)	
LTD.,)	
)	
DANIEL CAIN,)	
)	
HARJIT S. DHILLON,)	
)	
KULDIP SINGH GURAI,)	
)	
and)	
)	
BILLY LEE KYLE)	
)	
Defendants.)	

Defendants American Marine Express, Inc., Gurai Leasing Company, LLC, Intermodal Facilities Group, Ltd., Daniel Cain, Harjit S. Dhillon, Kuldip Singh Gurai, and Billy Lee Kyle hereby give notice that they are removing the consolidated cases of *Glenn Goodwin v. American Marine Express, Inc. et al.*, Cuyahoga County Common Pleas Case CV 17 886259 and *Ronald King v. American Marine Express, Inc. et al.*, Cuyahoga County Common Pleas Case CV 17 886390 to federal court pursuant to 28 U.S.C. §1441(a) and 28 U.S.C. §1446. The consolidated cases are pending before Judge Deena R. Calabrese. On April 26, 2018, the court granted

plaintiffs leave to file an amended complaint adding Intermodal Facilities Group, LLC and Billy Kyle as defendants. The amended complaint sets forth new claims under the Federal Truth in Leasing Regulations 49 C.F.R. Part 36 and 49 U.S.C. §14704 and the Federal Fair Labor Standards Act, 29 C.F.R. 531.35 and 29 U.S.C. 201 et seq. The amended complaint is attached as Exhibit 1. The court's orders granting leave to amend and deeming the amended complaint filed as of April 26, 2018 is attached as Exhibit 2.

This court has original jurisdiction of civil actions arising under the laws of the United States. 28 U.S.C. §1331. The amended complaint asserts actions arising under the Federal Truth in Leasing Regulations and the Federal Fair Labor Standards Act. These federal law claims were not pled in the original complaint which included only state law claims. This notice of removal is being filed pursuant to 28 U.S.C. §1446(b)(3) which permits removal after receipt of an amended pleading from which it may first be ascertained that the case is one which has become removable.

Respectfully submitted,

/s/John M. Manos

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Counsel for American Marine Express, Inc., Gurai Leasing Company, LLC, Intermodal Facilities Group, Ltd., Daniel Cain, Harjit S. Dhillon, Kuldip Singh Gurai, and Billy Lee Kyle.

CERTIFICATE OF SERVICE

A copy of the foregoing was served via U.S. Mail this 2nd day of May, 2018 upon the following:

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Respectfully submitted,

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